Commonwealth of Massachusetts

Executive Office of Health and Human Services



Expedited Psychiatric Inpatient Admission Policy

January 12, 2018





- Each day residents of the Commonwealth in need of inpatient psychiatric hospitalization wait in hospital Emergency Departments (EDs) for more than 12 hours
- Most of these people move on from the ED within the first 48 hours.
 About 10% of people are in the ED for 2 or more days¹
- For people waiting for a bed in psychiatric hospital facilities, if there is not a plan in place for them after 48 hours in the ED, there need to be other steps that can be taken to help them
- The Expedited Psychiatric Inpatient Admission Policy lays out what those next steps are and ensures that none of these people wait in EDs without additional help





- The Expedited Psychiatric Inpatient Admission Policy will be used to help people who are waiting in Emergency Departments to be accepted into a psychiatric hospital bed
- The Department of Mental Health (DMH), the state licensor of the inpatient psychiatric hospitals / units, is making changes to its regulations as part of this process
- The process was developed over the course of several months by a group convened by DMH and including:
 - MassHealth
 - Massachusetts Department of Public Health
 - Massachusetts Division of Insurance (DOI)
 - Massachusetts Health and Hospital Association (MHA)
 - Massachusetts Association of Behavioral Health Systems (MABHS)

- Massachusetts Association of Health Plans (MAHP)
- Blue Cross Blue Shield of Massachusetts
- Massachusetts Behavioral Health Partnership (MBHP) / Beacon Health Options
- Children's Mental Health Campaign (CMHC)
- Participants from individual providers
- This process is a significant change for EDs, Emergency Service Programs (ESPs), health insurance carriers, hospitals with inpatient psychiatric units, and state agencies



How does it work – the first 24 hours



- When a person in need of inpatient psychiatric hospitalization goes to an ED, they will be seen by the ED staff, and in some cases by an ESP provider²
- The ED and/or ESP determines that a person needs to be hospitalized and works to find an appropriate placement
- If the person is not placed within 24 hours, the ED/ESP lets the person's insurance carrier know that they are looking for a placement
 - The insurance carrier uses its internal processes for finding a placement and provides any useful information to the ED/ESP



How does it work – by 48 hours



If the person is not placed by 48 hours:

- The ED/ESP will make a formal Request for Assistance to the insurance carrier
 - This Request can be made before 48 hours, if it is clear that the person will not have a plan for placement by that time
 - The Request gives the carrier information about the person's condition,
 what has been done so far, and the barriers to finding a placement
- The carrier will work closely with the ED/ESP to determine the best placement options for the person
- The carrier will work within, and if needed, outside of its contracted network, to secure an appropriate placement



How does it work – by 96 hours



If the person is not placed by 96 hours:

- The carrier will contact DMH by submitting an online referral request using a secure web site
- The carrier will provide detailed information about what has happened so far and the person's current situation
- DMH will coordinate conversations with senior clinical staff from the carrier and hospital(s) to identify and resolve clinical barriers to placement
- Barriers related to payment, coverage or network access will be referred to MassHealth or to DOI, as appropriate
- DMH will initiate conversations with other parties, including other state agencies, as appropriate



0-48 hours

- Person with a behavioral health issue presents in ED
- Person is assessed by ED staff and/or ESP and needs inpatient level of care
- •ED/ESP searches for a bed
- At 24 hours, ED/ESP notifies the insurance carrier that their member is in the ED and they are looking for the bed

48-96 hours

 By 48 hours, if there is no plan in place, ED/ESP submits a formal Request for Assistance to carrier

<u>If the carrier is MassHealth or an instate commercial carrier:</u>

- The carrier receives the Request for Assistance and responds within 2 hours during business hours and the next morning if outside business hours
- •The carrier outreaches to hospitals identified as the most clinically appropriate for the person by the ED/ESP to try and place the person
- •At 96 hours, if there is not a plan in place, the carrier contacts DMH

If the carrier is ERISA, out of state, or Medicare:

- •The ED/ESP reaches out to the carrier as above
- •If they can not engage the carrier, the ED/ESP continues to pursue a bed for the person
- •At 96 hours, the ED/ESP contacts DMH

At 96 hours

- Carrier contacts DMH by submitting an online referral request using a secure web site
- •DMH reviews the information and if the issue is clinical, initiates a "doc to doc to doc" conversation
- •If the issue appears to be payment, DMH contacts
 MassHealth or DOI, as appropriate
- •DMH will engage other EOHHS agencies, as appropriate
- Data will be collected for use in regulatory compliance



If a carrier isn't involved



If the process cannot be used with an insurance carrier, either because the ED/ESP cannot engage anyone or because the person is uninsured:

- The ED/ESP will continue to look for a bed for the person
- At 96 hours, if there is not a plan in place, the ED/ESP will contact DMH by submitting an online referral request using a secure web site and will provide the same information that a carrier would have

Note: ED/ESPs will verify MassHealth eligibility for anyone who is uninsured



Who can DMH help using this process?



- Individuals in Emergency Departments who meet the criteria for psychiatric inpatient level of care:
 - Who have been waiting 96 hours
 - Who do not have a plan in place for their disposition
 - Whose carrier has been engaged on their behalf (if applicable)



Underlying Assumptions



- If the person is the client of a state agency, such as:
 - The Department of Mental Health (DMH),
 - the Department of Children and Families (DCF),
 - the Department of Developmental Services (DDS), or
 - the Department of Youth Services (DYS)

the ED/ESP can reach out to that agency at any time

- If a person does not meet psychiatric inpatient level of care, this process does not apply
- If a person is waiting in the ED for a confirmed placement to become available, this process does not apply
- If the barrier to placement is family or individual preference, this process does not apply
- If at any time during this process, a plan for placement is found, the process ends



Communication Expectations



Throughout a person's stay in the ED, the ED/ESP, Carrier, and state agencies are in regular, ongoing communication

- Current clinical information should always be brought forward and be readily available to all engaged parties
- Status of placement should always be communicated back to the ED/ESP



Insurance Carriers



- Some insurance carriers are regulated by the state and some are not
 - They are regulated by other states or the federal government
- The carriers regulated by MA will be required to use these processes
- EDs/ESPs will use the same process with all carriers whenever possible

Regulated by Massachusetts	Not Regulated by Massachusetts
MassHealth (Medicaid)	Other states' Medicaid plansMedicare
 In-state commercial carriers Examples: Blue Cross Blue Shield (BCBS)of MA Tufts Health Plan Harvard Pilgrim National Insurance Carriers offering fully insured products in Massachusetts: e.g. some Cigna, Aetna, UnitedHealthcare offerings 	 Self-Funded / ERISA plans* Other states' commercial carriers <u>Example:</u> Blue Cross Blue Shield of Minnesota National Insurance Carriers Examples: Cigna Aetna

^{*} Some of these plans are through in-state commercial carriers (e.g. BCBS of MA). Even when that is true, they are not regulated by the MA Division of Insurance (DOI)





Questions?

Please send additional questions to: Jay Tallman, Director of Policy, DMH Jay.Tallman@massmail.state.ma.us